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SEP 13 1991

Federal Communications Commission
Office of the Secretary

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September 12, 1991

ORIGINAL
FILE

Ms. Donna Searcy,
Secretary,
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20036

Dear Ms. Searcy,



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SEP 13 1991

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of Part 74 of) RM-7772
the Commission's Rules)
and Regulations with)
Regard to the Low Power)
Television Service)

To: The Commission

COMMENTS OF Deepak Viswanath, licensee of W36AS,
New Brunswick, New Jersey, with regard to RM-7772.

Deepak Viswanath hereby respectfully submits these comments on the Petition for Rule Making (RM-7772) filed by the Community Broadcasters Association ("CBA") on June 10, 1991.

The petition filed by the CBA proposes to amend Part 74 of the Rules and Regulations with regard to the Low Power Television Service. It is important to note that the petition does not propose any changes in the basic structure of the Low Power Television service. All applicants and licensee's understand that it is a secondary service and was sanctioned to permit entrepreneurs to service areas that were not effectively served by full power television stations.

W36AS was licensed about six months ago and is currently broadcasting ethnic television programs, produced by various community groups in the area. The channel is broadcasting about 20 hours a week and the response has been very encouraging. We will be expanding our program week to include more live shows, news, and local sporting events. The station is relatively new and we are aggressively getting the word out, through promotion and advertising.

Although we have been on the air for approximately six months, we have encountered many of the problems addressed by the CBA in the petition. First and foremost, the word "Low Power" immediately prompts questions with regard to reach. All broadcasters have a primary reach contour whether full power or not, but they may not reach every single point in that area due to terrain variations or other physical obstructions. The label Low Power brings unwarranted negative connotations in the minds of our supporters and force our sales staff to become defensive as opposed to actively selling the station breaks. Further it also suggests that our signal integrity is somehow inferior because it is low power. If we were called Community Broadcasters, then we would be judged solely on our reach and programming.

Ref: RM-7772

Recently we have informed the national ratings services of our start up and our interest in subscribing to one of their services. Both Nielsen and Arbitron have initially responded with the same concerns that have been brought up by the CBA. It is still too early to gauge what will happen, but I feel that the five letter call signs will present a problem down the road. I am fortunate that some other LPTV operators have already broken this ground, in getting their stations included in the ratings, and now it should be an easier obstacle to overcome. However as far as the audience is concerned, I feel they will never get accustomed to the five letter call signs. If the public can't remember what station they

Ref: RM-7772

The petition filed by the CBA addresses some important issues